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FEBRUARY 25, 2016

## Via ECF and E-mail

The Honorable Katherine B. Forrest,
United States District Court,
Southern District of New York,
500 Pearl Street,
New York, New York 10007-1312.

In re Aluminum Warehousing Antitrust Litigation, 13-MD-2481 (KBF)

## Dear Judge Forrest:

Re:

On behalf of defendants in the above-captioned matter, we write regarding the Individual Plaintiffs' Motion for Leave to File a Second Joint Amended Complaint ("IP Motion"), filed on February 19, 2016 (Dkt. # 888), and the First-Level Purchaser Plaintiffs' Motion for Leave to File a Fifth Amended Complaint ("FLP Motion"), filed on February 23, 2016 (Dkt. # 892). Defendants respectfully request a four-day extension of their deadline to respond to the IP Motion so that defendants can file a single consolidated opposition to both motions on March 11, 2016, the deadline for defendants' opposition to the FLP Motion.

Under Local Civil Rule 6.1(b) and Federal Rule of Civil Procedure 6(d), defendants' opposition to the IP Motion is due on March 7, 2016, and defendants' opposition to the FLP Motion is due four days later on March 11, 2016. Because both sets of plaintiffs seek leave "to file . . . nearly identical complaint[s]" and the FLP Motion expressly joins all of the arguments in the IP Motion in favor of leave to amend (FLP Motion, Dkt. # 892 at 1, 3; see also IP Motion, Dkt. # 888 at 2), a single opposition to both motions is warranted. A four-day extension of the due date for defendants' opposition to the IP Motion will enable defendants to file such a single opposition.

Counsel for the Individual Plaintiffs have agreed to the requested four-day extension of the deadline (to March 11, 2016) to respond to their motion and to the filing

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of a single consolidated opposition. This is defendants' first request for extension related to these motions.

Respectfully submitted,

Richard C. Pepperman

All Counsel of Record (via ECF) cc:

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